

Approved:

  
 Jackie Delligatti  
 Assistant United States Attorney

Before:

THE HONORABLE STEWART D. AARON  
 United States Magistrate Judge  
 Southern District of New York

**23 MAG 1174**

----- X  
 UNITED STATES OF AMERICA

- v. -

ROBERT ADAMS and  
 DEMETRIUS FRAZIER,

Defendants.  
 ----- X

**COMPLAINT**

Violations of  
 18 U.S.C. §§ 1708, 1704,  
 and 2

COUNTY OF OFFENSE:  
 NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

**DOC #**

LEIGH MESSETT, being duly sworn, deposes and says that she is a Postal Inspector with the United States Postal Inspection Service ("USPIS"), and charges as follows:

**COUNT ONE**  
**(Theft and Receipt of Mail Matter)**

1. On or about February 13, 2023, in the Southern District of New York and elsewhere, ROBERT ADAMS and DEMETRIUS FRAZIER, the defendants, did knowingly steal, take, abstract, and by fraud and deception did obtain, and attempt so to obtain, from and out of mail, post offices, stations thereof, letter boxes, mail receptacles, mail routes, other authorized depositories for mail matter, and from letter and mail carriers, letters, postal cards, packages, bags, and mail, and did abstract and remove from such letters, packages, bags, and mail, articles and things contained therein, and did secrete, embezzle, and destroy such letters, postal cards, packages, bags, and mail, and articles and things contained therein, and did steal, take, and abstract, and by fraud and deception did obtain, letters, postal cards, packages, bags, and mail, and articles and things contained therein, to wit, ADAMS and FRAZIER stole and received mail matter out of a United States Postal Service mail receptacle in Manhattan, New York.

(Title 18, United States Code, Sections 1708 and 2.)

**COUNT TWO**  
**(Theft of Postal Keys)**

2. On or about February 13, 2023, in the Southern District of New York and elsewhere, ROBERT ADAMS and DEMETRIUS FRAZIER, the defendants, willfully and knowingly did steal, purloin, embezzle, and obtain by false pretense keys suited to a lock adopted by the Post Office Department and the Postal Service and in use on the mails and bags thereof, and a key to a lock box, lock drawer, and other authorized receptacle for the deposit and delivery of mail matter, and knowingly and unlawfully made, forged, and counterfeited such key, and possessed such mail lock and key with the intent unlawfully and improperly to use, sell and otherwise dispose of the same, and to cause the same to be unlawfully and improperly used, sold, and otherwise disposed of, to wit, ROBERT ADAMS and DEMETRIUS FRAZIER, the defendants, unlawfully obtained and then used arrow keys belonging to the United States Postal Service to take mail matter without permission.

(Title 18, United States Code, Sections 1704 and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

3. I am a United States Postal Inspector and I have been personally involved in the investigation of this matter. I base this affidavit on that experience, on my conversations with other law enforcement officials, and on my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

4. Based on my conversations with other law enforcement officers involved in this investigation, as well as my review of relevant reports and records, I know, among other things, the following:

a. On or about February 13, 2023, at approximately 2:13 a.m., an individual (“Witness-1”) called in a complaint to the New York Police Department (“NYPD”) stating, in substance and in part, that Witness-1 had just observed two individuals who were not dressed as U.S. Postal Service employees appearing to remove mail and materials from a U.S. Postal Service collection box in the vicinity of East 65<sup>th</sup> Street and Second Avenue in Manhattan. Witness-1 gave a general description of the two individuals, and also reported that he witnessed the two individuals drive away from the scene in an older model white Lexus with duct tape attached to the rear bumper (the “Subject Vehicle”).


b. Upon receiving the information from Witness-1, NYPD officers were dispatched to the area in an effort to locate the Subject Vehicle and the individuals. Soon thereafter, NYPD officers observed a vehicle that fit the description of the Subject Vehicle in the vicinity of 70<sup>th</sup> Street between Second and Third Avenue in Manhattan.

c. NYPD officers stopped the Subject Vehicle and observed two individuals inside. The officers questioned the individuals, and the driver of the Subject Vehicle identified himself as ROBERT ADAMS, the defendant. Upon looking into the Subject Vehicle, NYPD officers observed in plain view a pile of mail in ADAMS's lap. The individual in the front passenger seat of the Subject Vehicle identified himself as DEMETRIUS FRAZIER, the defendant.

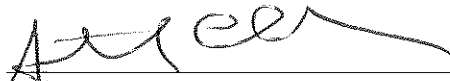
d. ADAMS and FRAZIER were subsequently arrested by NYPD officers and brought back to the 19<sup>th</sup> Precinct. Upon arrival at the 19<sup>th</sup> Precinct, at approximately 7:00 a.m., NYPD officers conducted an inventory search of the Subject Vehicle. During the search, the officers found in the back seat a black bag that was filled with a large number of articles of mail. NYPD officers also found in the driver's-side door panel a United States Postal Service "arrow key," that is, a key that is used by U.S. Postal Service employees to access locked mail receptacles. The officers also located in the driver's-side door several other keys that, based on my training and experience, I believe to be keys used by U.S. Postal Service employees to access locked mailboxes in different residential buildings.

e. Upon arrival at the Precinct, FRAZIER indicated that he wished to use the bathroom. An NYPD Lieutenant ("Lieutenant-1") led FRAZIER to a bathroom located within the Precinct. While FRAZIER was in the bathroom, Lieutenant-1 heard a clanking sound, as if FRAZIER had dropped an object into the toilet. After FRAZIER left the bathroom, "Lieutenant-1" entered and observed another arrow key in the toilet. Lieutenant-1 then retrieved the arrow key from the toilet.

WHEREFORE, I respectfully request that ROBERT ADAMS and DEMETRIUS FRAZIER, the defendants, be imprisoned or bailed, as the case may be.

  
 LEIGH MESSETT  
 Inspector  
 United States Postal Inspection Service

Sworn to me through the transmission of  
 this Complaint by reliable electronic  
 means (telephone), this 14<sup>th</sup> day of February, 2023.

  
 THE HONORABLE STEWART D. AARON  
 United States Magistrate Judge  
 Southern District of New York